IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST ATTACKS ON :

SEPTEMBER 11, 2001 : 03-MDL-1570 (GBD)(SN)

This Document Relates To:

Ryan, et al. v. Islamic Republic of Iran, et al., 1:20-cv-00266 (GBD)(SN)

PLAINTIFFS' NOTICE OF MOTION FOR ENTRY OF PARTIAL FINAL DEFAULT JUDGMENTS

PLEASE TAKE NOTICE that upon the accompanying Declaration of Dennis G. Pantazis, with exhibits, and the accompanying Memorandum of Law, Plaintiffs, the Estate of John J. Ryan and the Estate of Daniel L. Maher, respectfully move this Court for an Order awarding each of said Plaintiffs (1) economic damages for Plaintiffs, as identified in the expert reports attached as Exhibit A to the Declaration of Dennis G. Pantazis and contained on digital media to be delivered to the Court by overnight courier; and (2) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment.

This request of Plaintiffs, the Estate of John J. Ryan and the Estate of Daniel L. Maher, is made in connection with the judgment on default as to liability entered against the Islamic Republic of Iran on August 31, 2015, *sub. nom. Ashton, et al v. al Qaeda Islamic Army, et al.*, 02-cv-6987 (GBD)(FM)(1:03-md-01570, Doc. No. 3014).

A request for an award of punitive damages remains reserved.

Respectfully Submitted,

Date: February 11, 2020 /s/ Dennis G. Pantazis

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